

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
7 WEST 57TH STREET REALTY COMPANY,  
LLC, a Delaware Limited Liability Company,

Plaintiff,

-Against-

CITIGROUP, INC., CITIBANK, N.A., BANK OF  
AMERICA CORP., BANK OF AMERICA N.A.,  
BARCLAYS BANK PLC, UBS AG, JPMORGAN  
CHASE & CO., JPMORGAN CHASE BANK,  
NATIONAL ASSOCIATION, CREDIT SUISSE  
GROUP AG, BANK OF TOKYO-MITSUBISHI  
UFJ LTD., COÖPERATIEVE CENTRALE  
RAIFFEISEN-BOERENLEENBANK B.A., HSBC  
HOLDINGS PLC, HSBC BANK PLC, HBOS  
PLC, LLOYDS BANKING GROUP PLC,  
ROYAL BANK OF CANADA, THE  
NORINCHUKIN BANK, ROYAL BANK OF  
SCOTLAND GROUP, PLC, WESTLB AG,  
WESTDEUTSCHE IMMOBILIENBANK AG,  
DEUTSCHE BANK AG,

Defendants.  
-----X

Case No: 13-cv-0981 (PGG)

**ORAL ARGUMENT REQUESTED**

**DECLARATION OF PATRICK GONSALVES IN SUPPORT OF  
BARCLAYS BANK PLC'S MOTION TO DISMISS  
FOR LACK OF PERSONAL JURISDICTION**  
-----

I, Patrick Gonsalves, declare under penalty of perjury as follows:

1. I am Joint Company Secretary for Barclays Bank PLC (“BBPLC”) in London, England.
2. I submit this declaration in support of BBPLC’s Motion to Dismiss for Lack of Personal Jurisdiction in the above-captioned action. The facts stated herein are true and correct, to the best of my knowledge, based on records maintained by BBPLC in the ordinary course of business.
3. Except where otherwise indicated, all statements apply to the period from February 13, 2013 through November 14, 2014, and describe the operations of only BBPLC, not any separately incorporated and distinct subsidiary entities.
4. BBPLC is a financial institution organized under the laws of England and Wales.
5. BBPLC’s registered office and headquarters are located at 1 Churchill Place in London, England.
6. BBPLC is primarily a British bank with extensive business operations throughout the United Kingdom. In addition, BBPLC has 36 branches located outside of the U.K., three of which are located in the U.S. Two of BBPLC’s U.S. branches are located in New York, New York, and one is located in Miami, Florida.
7. BBPLC has Representative Offices located in Wilmington, Delaware; New York, New York; and Washington, D.C. It has no other Representative Offices in the U.S. These Representative Offices do not generate any revenue for BBPLC and engage in only limited activity, such as acting as a liaison with clients located in the U.S., collecting information about the U.S. economy, and providing information about BBPLC to U.S. investors.

8. In 2013, BBPLC's U.S. branches generated \$1.69 billion in revenue, which accounted for approximately 5% of BBPLC's \$33.65 billion worldwide revenue in 2013.

9. By way of comparison, in 2013, BBPLC's U.K. operations generated \$26.67 billion in revenue, which accounted for approximately 79.3% of BBPLC's \$33.65 billion worldwide revenue in 2013.

10. BBPLC is registered as a financial holding company with the Federal Reserve Bank of New York pursuant to the Bank Holding Company Act of 1956, 12 U.S.C. § 1841 *et seq.*

11. BBPLC is registered as a Foreign Bank Branch and as an Exempt Mortgage Loan Servicer with the New York Department of Financial Services.

12. BBPLC holds a Debt Collector Agency license issued by the New York City Department of Consumer Affairs.

13. BBPLC sponsors Level 1 American Depositary Receipts within the U.S.

14. BBPLC owns no real estate in the U.S.

15. BBPLC holds three leases for real property in the U.S., one at 200 Park Avenue, New York, New York; one at 27-01 Queens Plaza North, Long Island City, New York; and one at 1111 Brickell Avenue, Miami, Florida.


16. As of December 31, 2012, less than 500, or 0.8%, of BBPLC's approximately 55,750 full-time permanent, temporary and graduate payroll employees worldwide were located in the U.S. Approximately 450 of those U.S. employees were located in New York.

17. None of BBPLC's U.S. branches or offices has ever been responsible for the determination or submission of rates to the British Bankers' Association in the U.K. for use in

the calculation of U.S. Dollar LIBOR. BBPLC's U.S. Dollar LIBOR submissions are determined and submitted by employees located outside of the United States.

18. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief, based on records maintained by BBPLC in the ordinary course of business.

Executed in London, England on November 14, 2014.



Patrick Gonsalves